

**VIA ECF**

January 5, 2017

The Honorable Donna M. Ryu  
Northern District of California  
Oakland Courthouse, Courtroom 4 – 3rd Floor  
1301 Clay Street  
Oakland, CA 94612

Re: *L.A. Taxi Coop., Inc. et al. v. Uber Tech., Inc. et al.*, No. 3:15-cv-01257-JST

Dear Judge Ryu:

Plaintiffs submit this letter in response to the Court's Order dated January 4, 2017 (the "Order")(Docket 111) and the Joint Letter Brief (Docket No. 100). Attached to this letter, and as requested by the Court at Page 1, Line 28 of the Order, are Plaintiffs' original and any amended or supplemental verified responses to Defendants' Interrogatory No. 5 which sets forth the specific jurisdictions where the Plaintiff companies provided taxi services to the public. At the hearing on January 12, 2017, Plaintiffs will provide the Court with copies of all relevant testimony and documents referenced on p. 2 of the Joint Letter Brief and will be prepared to summarize such testimony and documents as requested by the Court.

As to the Court's final question regarding "trip data," on August 8, 2016, in an email to counsel for Defendants, I provided him an unredacted version of what is called a "ride trip spreadsheet." Subsequently, Plaintiffs that operate in the City of Los Angeles produced one month each of redacted ride trip spreadsheets. These monthly spreadsheets are required by the LA Department of Transportation from all taxi companies that operate in the City of Los Angeles. Because these spreadsheets contained personal identifying information from specific passengers, such as name, street address and telephone number, I informed counsel that any further production of such spreadsheets would require significant redaction by Plaintiffs' counsel. As would be expected for large taxi companies, the number of individual rows of data, each row representing a taxi ride, is massive. For example, the redacted spreadsheet produced to Defendants for G & S Transit for January 2014 contained over 34,000 rows of data. The January 2014 spreadsheet from G & S Transit identifies by specific zone and sub-zone the area of the City of Los Angeles where a taxi passenger was picked up. In conjunction with the amended responses to Interrogatory No. 5, the sworn testimony of the corporate representative of each Plaintiff company and the ride trip spreadsheets provided for the companies operating in the City of Los Angeles, Defendants are fully informed of the exact jurisdictions where each Plaintiff company provides taxi services. Upon the Court's request, Plaintiffs will provide electronic copies of the ride trip spreadsheets produced to Defendants. However, because of the size of these documents and the fact that they are Excel spreadsheets, it would be extremely difficult to provide the Court with hard copies of such documents. Plaintiffs also request that if the Court wants to review the unredacted spreadsheet provided to Defendants' counsel on August 8, 2016, that document be submitted under seal to protect the privacy rights of Plaintiffs' customers.

Respectfully submitted,

/s/ George S. Trevor  
George S. Trevor  
Counsel for Plaintiffs